



Capital  
Community  
Television

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July 25, 2013

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video  
Programming Guides and Menus, MB Docket No. 12-108,  
Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Capital Community Television (CCTV) in Salem, Oregon submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

CCTV in Salem is a public, educational and government access non-profit organization in Salem, Oregon. We were founded 24 years ago to help fill a media void. Caught between the media markets of Portland and Eugene, Salem is the largest state capital in the United States with no local broadcast TV affiliate. We have one daily paper and three AM radio stations. CCTV serves a cable service area community of about 250,000 and about 56,000 cable subscribing households with Salem City Council, Marion County Commission and Salem-Keizer School Board meetings; student/teacher work, performances and sports from our local schools; and informational programs and services to approximately 200 local non-profit organizations and government agencies. We also enable members of the community to provide informational programs.

We carry hundreds of programs on our channels each week, of which regular programs Classic Arts Showcase and Democracy Now are captioned. We also receive programs from the Armed Services and Recovery Networks that are captioned. The onscreen video programming guide of our multichannel video programming Comcast Cable does not provide a label or symbol indicating that these programs have closed captions.

We have program descriptions and accessibility information for our programs with accessibility options such as closed captions. However, currently, Comcast provides no specific information. The viewer sees only generic "Government access programming" or "Public access programming" labels. This information does not meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA).

Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information to include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

A handwritten signature in black ink, appearing to read "Alan Bushong". The signature is fluid and cursive, with the first name "Alan" and last name "Bushong" clearly distinguishable.

Alan Bushong  
CCTV Executive Director